

REMARKS

Pursuant to the present amendment, claims 1, 11-13, 18, 25-27, 32, 38-41 and 57 have been amended, claims 10, 24 and 37 have been canceled, and new claims 70-73 have been added. Thus, claims 1-9, 11-23, 25-36 and 38-73 are pending in the present application. No new matter has been introduced by way of the present amendment. Reconsideration of the present application is respectfully requested.

In the Final Office Action, claims 1-69 were rejected under 35 U.S.C. § 102 as allegedly being anticipated by Pallini (U.S. Patent Publication No. 2001/0045286). Applicants respectfully traverse the Examiner's rejections.

Pursuant to the present amendment, independent claims 1, 18, 32 and 57 have been amended to recite that each of the plurality of locking segments comprises a first primary locking shoulder that is adapted to engage a first surface on the first component and a second primary locking shoulder that is adapted to engage a second surface on the second component. Independent claim 46 already includes such limitations. It is respectfully submitted that all pending claims are allowable over the art of record.

In the Final Office Action, the Examiner identified the wellhead housing 15 as the first component, the riser 13 as the second component and the dogs 51 as the locking segments. It is beyond legitimate dispute that the dogs 51 do not engage both the first and second components 15, 13 as required by the pending claims. More specifically, each of the dogs 51 in Pallini does not comprise a first primary locking shoulder that is adapted to engage a first surface on the first component **and** a second primary locking shoulder that is adapted to engage a second surface on

the second component as set forth in all pending claims. Thus, Pallini does not anticipate the pending claims for at least this reason.

Moreover, there is no suggestion in the art of record to modify the device disclosed in Pallini so as to meet the limitations set forth in the pending claims. One of Pallini's primary objectives is to reduce the physical size of the tieback connectors. See, *e.g.*, ¶¶ 6, 50. To this end, Pallini discloses the use of a lower dog retainer ring 53 to hold the dogs 51 within the housing 25. ¶ 19. The retainer ring 53 appears to be some type of split ring as its upper portion is engaged within a recess (unlabeled) formed on the end of the riser 13 and it has a horizontal shoulder that abuts the riser shoulder 19. See Figure 2. One thing is clear, the ring 53 is not part of the lower dogs 51 – it is a ring-type construction that is used to hold the dogs 51 within the housing 25.

It is respectfully submitted that one skilled in the art would not be motivated to modify the dogs 51 in Pallini and then position them such that each of the plurality of locking segments comprise a first primary locking shoulder that is adapted to engage a first surface on the first component and a second primary locking shoulder that is adapted to engage a second surface on the second component. First, it is believed that attempting to modify the dogs 51 shown in Pallini such that each dog 51 engages **both** the first and second components would require a larger physical device – something Pallini expressly teaches away from. For example, the diameter of the housing 25 in Pallini would have to be increased to provide enough space such that at least the upper portions of the dogs 51 would have room to be positioned around the end of the riser 13 – which clearly has a larger outer diameter (at the point where the shoulders 19

and 21 abut) than that of the wellhead 15. Thus, it is respectfully submitted that there would be no motivation to modify the structure of Pallini to meet the limitations of the pending claims.

For at least these reasons, all pending claims are believed to be in condition for allowance.

Additionally, Pallini is not believed to anticipate several dependent claims. For example, claims 6, 20, 33 and 47 recite that the first end of the connector is threadingly coupled to the first component. The dogs 51 in Pallini are clearly not threadingly coupled to the wellhead 15 – the “first component” according to the Examiner.

Additionally, Pallini is not believed to anticipate or render obvious the invention defined in claims 9, 23, 36 and 50 which recites at least one indicator rod or connector rod (depending on the claim) to indicate a position of the locking mandrel. The Examiner has not identified any specific structure in Pallini that meets this limitation. Nor is there any suggestion in the art of record to make such a modification to the device shown in Pallini.

New claims 70-73 have been further added to define Applicants' invention. Each of these claims ultimately depend from allowable independent claims, as discussed above. Moreover, each of these dependent claims is believed to be allowable for independent reasons. Pursuant to these claims, the primary piston is positioned within a body of the connector. Thus, these dependent claims define a structure that Pallini was expressly trying to avoid due to its physical size. See Pallini ¶ 6. Thus, it is respectfully submitted that, based upon the art of record, those skilled in the art would not be motivated to modify the device shown in Pallini to incorporate a piston with the body of the connector, as it would defeat one of the primary objectives Pallini is trying to achieve.

For at least the aforementioned reasons, it is respectfully submitted that all pending claims are in condition for immediate allowance. The Examiner is invited to contact the undersigned attorney at (713) 934-4055 with any questions, comments or suggestions relating to the referenced patent application.

Respectfully submitted,

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